

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DING MING LIU, XIANG WEI CHEN, JIAN RONG
KE, CHUAN JING LIN, MU QIU LIU, ZHONG MIN
SHI, SHENG DA WENG, GUO FENG ZHANG, and
GUO LI ZHANG,

Plaintiffs,

- against -

JIN JIN COMMERCE CORP., XIN XIN COMMERCE
CORP., HAI BING WANG, JANE DOE I, a/k/a
"Cindy", and JANE DOE II, a/k/a "Xiao Yen,"

Defendants.

STIPULATION

Case No. 08 CIV 4199 (GBD)
HON. GEORGE B. DANIELS, USDJ

SO ORDERED

The conference is adjourned to
November 18, 2008 at 10:00 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

AUG 28 2008

WHEREAS, this Court adjourned, on July 15, 2008, the Initial Pretrial Conference in this matter to September 4, 2008, upon the request of the plaintiffs DING MING LIU, XIANG WEI CHEN, JIAN RONG KE, CHUAN JING LIN, MU QIU LIU, ZHONG MIN SHI, SHENG DA WENG, GUO FENG ZHANG, and GUO LI ZHANG (the "Plaintiffs");

WHEREAS, THE LAW OFFICE OF PETER WESSEL, PLLC, by PETER WESSEL, ESQ., appeared on behalf of the defendants JIN JIN COMMERCE CORP., XIN XIN COMMERCE CORP., HAI BING WANG, JIAN-XU SUN and XIAO YAN WANG (the "Defendants") on July 16, 2008;

WHEREAS, this Court entered an order, on July 28, 2008, approving the parties' stipulation extending to August 18, 2008, Defendants' time to answer or serve and file a motion in response to the complaint;

WHEREAS, Defendants filed on August 18, 2008, a Motion to Dismiss seeking dismissal of the claims filed by DING MING LIU and asserting affirmative defenses based on certain statutes of limitations (the "Motion");

WHEREAS, Plaintiffs require additional time to prepare and file an opposition to the Motion; and

WHEREAS, counsel for Plaintiffs and Defendants have conferred and agree that additional time will also allow for meaningful settlement discussions to occur and for the parties to determine whether mediation is appropriate at this time.

IT IS HEREBY STIPULATED AND AGREED, that:

1. Plaintiffs' opposition to the Motion is due October 8, 2008; and
2. Defendants' reply, if any, is due November 10, 2008;

IT IS STIPULATED AND AGREED, that, in order to permit meaningful settlement discussions, the parties respectfully request a second adjournment of the Initial Pretrial Conference to November 1⁸~~7~~, 2008, or to such other time as this Court may order; and

IT IS FURTHER STIPULATED AND AGREED, that the parties respectfully request leave to file the Federal Rule of Civil Procedure 26(f) report fourteen days after this Court issues its ruling on the Motion.

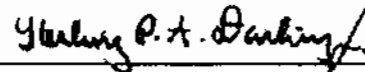
Dated: August 26, 2008.

LAW OFFICE OF PETER WESSEL, PLLC



PETER WESSEL (PW-4164)
Attorney for named Defendants
JIN JIN COMMERCE CORP., XIN XIN
COMMERCE CORP., HAI BING WANG,
JIAN-XU SUN and XIAO YAN WANG
270 Madison Ave., Suite 1203
New York, New York 10016-0601
(212) 532-9700/(212) 202-7522 (fax)

LINKLATERS LLP



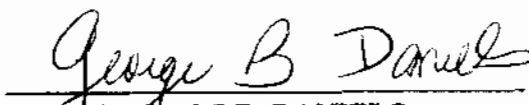
JOSEPH B. SCHMIT (JS-1243)
A. HYUN RICH (AR-7900)
STERLING P.A. DARLING, JR. (SD-6413)
Attorneys for Plaintiffs
DING MING LIU, XIANG WEI CHEN,
JIAN RONG KE, CHUAN JING LIN, MU
QIU LIU, ZHONG MIN SHI, SHENG DA
WENG, GUO FENG ZHANG, and GUO
LI ZHANG
1345 Avenue of the Americas
New York, New York 10105-6026
(212) 903-9000/(212) 902-9100 (fax)

URBAN JUSTICE CENTER



DAVID A. COLODNY (DC-4234)
Attorneys for Plaintiffs
DING MING LIU, XIANG WEI CHEN,
JIAN RONG KE, CHUAN JING LIN, MU
QIU LIU, ZHONG MIN SHI, SHENG DA
WENG, GUO FENG ZHANG, and GUO
LI ZHANG
123 William Street, 16th Floor
New York, New York 10038-3800
(646) 459-3006/(212) 533-4598 (fax)

SO ORDERED:



HON. GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

AUG 28 2008